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BEFORE THE ARIZONA CORPORATION COMMISSION
AZ CORP COMMISSION

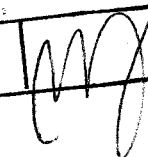
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COMMISSIONER

SEP 29 1 54 PM '98

Arizona Corporation Commission
DOCKETED

IN THE MATTER OF TRICO ELECTRIC)
COOPERATIVE'S RESIDENTIAL)
PHASE-IN PROGRAM PROPOSAL)
PURSUANT TO A.A.C. R14-2-1604.B.4)

DOCKET NO. E-01461A-98-0526
SEP 29 1998

DOCKETED BY 

RUCO'S COMMENTS ON RESIDENTIAL PHASE-IN PROGRAM

The Residential Utility Consumer Office ("RUCO") offers the following comments regarding the Residential Phase-In Program submitted by Trico Electric Cooperative, Inc. ("Trico").

Trico proposes to make direct access ("DA") available approximately 105 residential customers each quarter during the phase-in period. Customers in excess of the quarterly allocation who apply for DA will be placed on a waiting list, to become eligible in future quarters. Trico's proposal provides that customers who become eligible for DA, but fail to select a competitive Electric Service Provider ("ESP") within 90 days of their eligibility to do so, will lose their DA slot and must re-apply for eligibility. It is unclear, however, whether the vacated slots will be re-assigned to other customers.

RUCO would oppose customers losing their DA eligibility, if the vacated DA slots are not reassigned to other customers. Revoking customers' eligibility without passing that eligibility on to other customers could result in a pool of eligible customers which never grows

1 to the 4% mark that the Competition Rules contemplate at the end of the two-year phase-in
2 period.

3 RUCO proposes that slots for customers who lose their eligibility be filled in the next
4 quarter. However, such customers' slots should not be counted toward the approximately 105
5 new customers eligible for direct access in that quarter.
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7 RESPECTFULLY SUBMITTED this 29th day of September, 1998.

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9 
10 Scott S. Wakefield
11 Chief Counsel

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13 AN ORIGINAL AND TEN COPIES
14 of the foregoing filed this 29th day of
15 September, 1998 with:

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